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March 10, 2021

Via ECF

The Honorable Roanne L. Mann
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: Yelena Ruderman v. Law Office of Yuriy Prakhin, P.C., et al.
E.D.N.Y. Case No. 19-cv-02987 (RJD) (RLM)**

Dear Magistrate Judge Mann:

As you are aware, this firm represents Defendants, Law Office of Yuriy Prakhin (the “Firm”) and Yuriy Prakhin, Esq. (“Mr. Prakhin”) (collectively, “Defendants”) in the above-referenced action. We write to respectfully request an extension of the March 12, 2021 deadline to submit a request for a pre-motion conference.

On November 3, 2020, Your Honor extended the discovery deadline and ordered that “requests for a promotion conference are [] due by March 12, 2021.” Thereafter, the parties continued to engage in discovery and filed motions to compel on January 18 and 19, 2021. Your Honor held a hearing regarding these motions on February 22, 2021. Pursuant to Your Honor’s February 22, 2021 Order (ECF No. 52), Defendants’ submitted documents to the Court for *in camera* review and the parties exchanged of additional discovery on March 8, 2021. The parties have also agreed to further supplement their discovery productions on March 12, 2021 in accordance with their ongoing discovery obligations. In light of the foregoing, Defendants respectfully request a two-week extension of the deadline to submit a request for a pre-motion conference up to, and including, March 26, 2021.

Defendants conferred with Plaintiff regarding this extension request. Plaintiff refused to consent.

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Thank you for Your Honor's consideration in this matter.

Respectfully submitted,

/s/ MED

Mary Ellen Donnelly
Nicole E. Price

cc: All Counsel of Record (via ECF)